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February 27, 2009  
**Via ECFS**

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**Annual 64.2009(e) CPNI Certification for 2008**  
**ANEW Broadband, Inc. - Form 499 Filer ID 822854**

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of ANEW Broadband, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes  
Consultant to  
ANEW Broadband, Inc.

Attachments  
*MB/sp*

cc: FCC Enforcement Bureau (2 copies)  
Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
D. Contreras - ANEW  
file: ANEW - FCC  
tms: FCCx0901

Annual 64.2009(e) CPNI Certification for:

Calendar Year 2008

Date Filed:

February 27, 2009

Name of Company covered by this certification:

ANEW Broadband, Inc.

Form 499 Filer ID:

822854

Name of Signatory:

Daniel R. Contreras

Title of Signatory:

Chief Financial Officer

I, Daniel R. Contreras, certify and state that:

1. I am the Chief Financial Officer of ANEW Broadband, Inc. and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. Section 64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Daniel R. Contreras, Chief Financial Officer  
ANEW Broadband, Inc.

Date

02/27/09

Attachment A  
Statement of CPNI Procedures and Compliance

**ANew Broadband, Inc.**

Calendar Year 2008

## **ANEW Broadband, Inc.**

### **Statement of CPNI Procedures and Compliance**

ANEW Broadband, Inc. ("ANEW" or "Company") provides local and long distance telecommunications services to business and residential customers. The Company does not obtain, retain or use CPNI, including call detail records, to market any telecommunications services and has trained personnel not to use CPNI for marketing purposes. Should ANEW elect to use CPNI in the future, for marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company has implemented firewalls for protection of CPNI and call detail records in order to safeguard such data. All call detail records are stored on firewall-protected computer systems and access to those machines are controlled by the company via an access control list. All servers are monitored via SNMP, and anomalies trigger email notifications to the network administrator and supervisors. Procedures against unauthorized access to CPNI are part of the Company's regular monitoring of operations. Company employees are prohibited from disclosing CPNI and call detail records and has procedures which provide for disciplinary action for such violations, up to and including termination of employment. The company has implemented language in the employee manual regarding CPNI and the requirements for disclosure. The company's Customer Service Manager conducts training and enforcement of training regarding the regulation of customer information.

The Company does not disclose call record information over the telephone.

The Company provides its customers with on-line access to CPNI. On-line customers are required to select a username and password to gain access to their account information. In the event of a lost or forgotten password, the company does not prompt the customer for readily available biographical or account information, but instead emails information to the email account of record, which allows the customer to reset the password.

**ANew Broadband, Inc.**

**Statement of CPNI Procedures and Compliance**

(Page 2)

Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information) , password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

The Company has procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company did not take any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.